

EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AUTONOMOUS DEVICES LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 22-1466-MN
)	
TESLA, INC.,)	
)	
Defendant.)	

[PROPOSED] ORDER REGARDING DISCOVERY DISPUTES (D.I. 66)

The Court, having reviewed the parties' letters regarding the Motion for a Teleconference to Resolve Discovery Disputes (D.I. 66), hereby ORDERS as follows. Within ten (10) days of this Order, Defendant Tesla, Inc. shall provide the following discovery:

- 1) Tesla shall supplement its responses to Autonomous Devices LLC ("AD")'s April 7, 2023 discovery requests to include predecessor supercomputers as "Accused Instrumentalities";
- 2) Tesla shall produce "[a]ll training materials (including videos and wikis) provided to new employees of the software development team regarding the source code, architecture, technology stack, history, and FAQs concerning the Accused Instrumentalities" as requested in AD's Request for Production No. 35;
- 3) Tesla shall produce documents in response to AD's Request for Production Nos. 85, 87, 88, and 89;
- 4) Tesla shall respond to AD's Interrogatory No. 10 to identify former managers and supervisors involved in the fleet learning aspects of Tesla's Full Self Driving and Enhanced Autopilot technology, including their name, last known contact information, former title at Tesla and dates of employment; and
- 5) Tesla shall produce all patent license agreements regarding the Accused Instrumentalities and similar or comparable technologies to the asserted patents as requested by AD's Request for Production Nos. 60, 79, and 80 and shall respond to AD's Interrogatory No. 8 to identify the requested agreements.

Dated: _____

The Honorable Laura D. Hatcher